

1 Adam B. Wolf (SBN 215914)
2 Catherine Cabalo (SBN 248198)
3 PEIFFER WOLF CARR KANE CONWAY &
4 WISE, LLP
5 4 Embarcadero Center, Suite 1400
6 San Francisco, CA 94111
7 Telephone: (415) 766-3592
8 Facsimile: (415) 402-0058
9 awolf@peifferwolf.com
10 ccabalo@peifferwolf.com

11 Irakli Karbelashvili (SBN 302971)
12 ALLACCESS LAW GROUP
13 1400 Coleman Ave Ste F28
14 Santa Clara, CA 95050
15 Telephone: (408) 295-0137
16 Fax: (408) 295-0142
17 irakli@allaccesslawgroup.com

18 Paul L. Rein (SBN 43053)
19 Aaron M. Clefton (SBN 318680)
20 REIN & CLEFTON, Attorneys at Law
21 1423 Broadway #1133
22 Oakland, CA 94612
23 Telephone: (510) 382-5001
24 Facsimile: (510) 832-4787
25 info@reinclefton.com

26 Attorneys for Plaintiff
27 Christine DiBella

28 **Defense counsel listed after caption*

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 CHRISTINE DiBELLA,
4 Plaintiff,

5 v.

6 BOARD OF TRUSTEES OF THE CALIFORNIA
7 STATE UNIVERSITY; ET AL.

8 Defendants.

9 Case No. 3:21-cv-08461-TLT
10 Civil Rights

11 **NOTICE OF SETTLEMENT IN PRINCIPLE
12 AND REQUEST TO VACATE
13 SETTLEMENT CONFERENCE IN DOCKET
14 NO. 89**

15 3rd Amended Complaint Filed: April 24, 2023

16 ALISON K. BEANUM, State Bar No. 221968
17 alison.beanum@clydeco.us
18 DOUGLAS J. COLLODEL, State Bar No. 112797
19 douglas.collodel@clydeco.us
20 CLYDE & CO US LLP
21 355 South Grand Avenue, Suite 1400
22 Los Angeles, California 90071

1 Telephone: (213) 358 7600
2 Facsimile: (213) 358 7650

3 Attorneys for Defendant
4 BOARD OF TRUSTEES OF THE
5 CALIFORNIA STATE UNIVERSITY and individual defendants

6 TO THE COURT, ALL PARTIES, AND COUNSEL FOR ALL PARTIES:

7 PLEASE TAKE NOTICE that Plaintiff Christine DiBella (“Plaintiff”) and Defendant
8 Board of Trustees of the California State University (“the Board”) (Plaintiff and Defendants
9 together the “Parties”)—have reached an agreement in principle to globally resolve all claims
10 between the Parties pending in this action. The Parties are in the process of drafting and
11 executing a formal settlement agreement (“the Agreement”) and related dismissal papers. The
12 Parties anticipate the Agreement will be filed within 60 days.

13 The Parties request that the September 1, 2023, Settlement Conference identified in
14 Docket No. 89 be vacated. The Parties shall file a Joint Status Report by September 18, 2023.

15 Respectfully submitted,

16 Date: August 25, 2023 PEIFFER WOLF CARR KANE CONWAY & WISE, LLP

17 */s/ Catherine Cabalo*
18 By: Catherine Cabalo
19 Attorneys for Plaintiff Christine DiBella

20 Date: August 25, 2023 CLYDE & CO US LLP

21 */s/ Alison K. Beanum*
22 By: Alison K. Beanum
23 Attorneys for Defendant Board of Trustees of the
24 California State University

25 **FILER’S ATTESTATION**

26 Pursuant to Local Rule 5-1, I hereby attest that on August 25, 2023, I, Catherine
27 Cabalo, attorney with Peiffer Wolf Carr Kane Conway & Wise, LLP, received the concurrence
28 of Alison Beanum in the filing of this document.

Date: August 25, 2023

/s/ Catherine Cabalo
Catherine Cabalo